



**U.S. Department of Justice**  
Civil Division, Federal Programs Branch  
1100 L Street NW  
Washington, DC 20005

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April 22, 2022

**VIA ECF**

The Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Batalla Vidal, et al. v. Mayorkas, et al.*, No. 16-cv-4756 (NGG) (VMS)

Dear Judge Garaufis:

Defendants submit this letter in response to the Court's order directing them to submit "a proposed timeline for which their obligation to answer an amended complaint, if any, would be stayed." 04/04/2022 Minute Entry.

Should Plaintiffs file a fifth amended complaint, Defendants propose that their obligation to answer or otherwise respond to the amended complaint be stayed until 21 days after the Court's order on Plaintiffs' motion to clarify.

Defendants have conferred with Plaintiffs' counsel, who have indicated that Plaintiffs consent to this schedule.

Defendants thank the Court for its consideration of this matter.

Dated: April 22, 2022

Respectfully submitted,

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